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November 29, 2023

APPLICATION GRANTED
SO ORDERED

VIA ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 14A
New York, New York 10007-1312


John G. Koeltl, U.S.D.J.

11/30/23

RE: Oluwole Ogundare v. Trans Union, LLC
USDC – Southern District Of New York
Case Number: 1:23-cv-06085-JGK

Dear Judge Koeltl:

We represent Trans Union in the above-referenced matter and write, jointly with *pro se* Plaintiff, with regard to the Case Management Order entered by the Court, Doc. No. 11.

Pursuant to the parties' proposed dates, Discovery was proposed to close on March 27, 2024. The Order entered by the Court set a deadline for Dispositive Motions on January 9, 2024. The parties jointly request that the Court revise the deadline for Dispositive Motions to May 15, 2024, or approximately 45 days after the close of discovery.

This is the first such request by the parties and is not made for undue delay. The parties have diligently exchanged written discovery and are in the process of following up with any additional requests as needed and scheduling depositions.

Respectfully submitted,

SCHUCKIT & ASSOCIATES, P.C.



Camille R. Nicodemus

CRN/jks
cc: Oluwole Ogundare (by email)